



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

March 18, 2015

Alec Wong
Manager
Clean Water Branch
Environmental Management Division
Hawaii State Department of Health
P.O. Box 3378
Honolulu, HI 96801-3378

RE: EPA's Draft Permit Quality Review (PQR) Report

Dear Mr. Wong:

Alec


Please find enclosed EPA's draft Permit Quality Review (PQR) Report for your review and comment. As you know, EPA Region 9 conducted a comprehensive review of selected NPDES permits developed by the Hawaii State Department of Health (HDOH). I'd like to express my gratitude for the time and efforts HDOH staff provided to assist our review.

The PQR is intended to assess how States are implementing the requirements of the National Pollutant Discharge Elimination System (NPDES) program. The PQR is an evaluation of a select set of NPDES permits to determine whether the permits have been developed in a manner consistent with applicable requirements established in the Clean Water Act (CWA) and NPDES regulations. Through this review mechanism, EPA promotes national consistency and identifies both successes in implementing the NPDES program and opportunities for improving development of NPDES permits.

Generally, as described in the draft PQR, EPA found Hawaii NPDES permits, fact sheets and permit files were well written and consistent with federal requirements. However, we identified several concerns regarding permitting documentation. We would appreciate receiving any comments the State wishes to provide concerning the draft report by April 30, 2015. We will consider your comments and make appropriate changes when we finalize the PQR, and we will include your comments as an appendix. We would also be happy to meet with you to discuss the draft report during the comment period.

I look forward to our continuing partnership in permit development. Please call me at (415) 972-3275 or David Smith at (415) 972-3464 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "David Smith". The signature is fluid and cursive, with the first name "David" and last name "Smith" clearly distinguishable.

David Smith, Manager
NPDES Permits Section
Water Division

Enclosure